ERIC A. LIEPINS ERIC A. LIEPINS, P.C. 12770 Coit Road Suite 1100 Dallas, Texas 75251 (972) 991-5591 (972) 991-5788 - telecopier

## PROPOSED ATTORNEY FOR DEBTOR

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE	§	
	§	
FOUNDRY CLUB, LLC	§	Case No. 18-32177
DEBTOR	§	

#### AMENDED MOTION TO DISMISS

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, 1100 COMMERCE STREET, 12<sup>TH</sup> FLOOR DALLAS, TEXAS 75242, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING.

IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.

## TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Foundry Club LLC., ("Debtor"), in the above-styled and numbered cause, and files this its Motion to Dismiss ("Motion"), and in support thereof would respectfully show unto the Court as follows:

1. On or about July 2, 2018 Debtor filed its Voluntary Petition for relief under Chapter 11 of the United States Bankruptcy Code and has continued in possession of its property and operation of its business as a Debtor-in-Possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code.

- 2. The Debtor operated a cooperative office space business in Dallas Texas.
- 3. As a result of an order allowing the landlord to take over the space the Debtor business was closed down.
  - 4. The Debtor has no operations and no ability to reorganize.
  - 5. Debtor seeks to dismiss this proceeding.

WHEREFORE, PREMISES CONSIDERED, Debtor, Foundry Ventures, Inc, respectfully prays this Honorable Court enter an Order Dismissing this case, and for such other and further relief, at law or in equity, to which Debtor may show itself justly entitled.

Respectfully submitted,

ERIC A. LIEPINS, P.C. 12770 Coit Road, Suite 1100 Dallas, Texas 75251 (972) 991-5591 (972) 991-5788 - fax

BY: <u>/s/ Eric Liepins</u>
ERIC A. LIEPINS, SBN 12338110

# CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to all

creditors and the United States Trustee, United States mail on this the 22<sup>nd</sup> day of October 2018.

\_\_/s/ Eric Liepins\_\_\_\_\_ Eric A. Liepins